

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION *IN LIMINE* OF DEFENDANTS TO PRECLUDE PLAINTIFF'S  
EXPERT REPORT

Defendant, Susquehanna County, through its attorneys, Kreder Brooks  
Hailstone LLP, hereby makes the following Motion *in Limine*:

1. Plaintiff has provided an Expert Report prepared by Patricia Staples.
2. It is believed that Plaintiff intends to provide the Report and testimony of Patricia Staples during trial.
3. Plaintiff should be precluded from introducing the Report or Testimony of its Expert.
4. The Plaintiff's expert report is violative of Federal Rule of Evidence 702.

5. Additionally, the Plaintiff's Expert Report and Expert Testimony should be precluded because it contains credibility determinations and legal conclusions.

WHEREFORE, Defendant, Susquehanna County, respectfully request the Court to issue an Order precluding Plaintiff's Expert report.

Respectfully submitted,

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Suite 200  
Scranton, PA 18503  
(570) 346-7922

By /s/ A. James Hailstone  
A. James Hailstone  
Attorney I.D. #80055

CERTIFICATE OF SERVICE

AND NOW, this 21<sup>st</sup> day of August, 2020, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion in Limine with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

Gerard M. Karam, Esquire  
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*ATTORNEYS FOR PLAINTIFF*

/s/ A. James Hailstone

A. James Hailstone

Attorney I.D. #80055

Attorneys for Defendant